

Judge Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

JESUS ENRIQUE PALOMERA,

Defendant.

NO. CR14-5394 RJB

STIPULATED MOTION FOR
PROTECTIVE ORDER

FILED UNDER SEAL

NOTING DATE: July 29, 2016

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Michael Dion and Amy Jaquette, Assistant United States Attorneys, and Defendant, Jesus Enrique Palomera, by and through his attorney, Thomas Weaver, hereby file this Motion for Entry of a Protective Order, and present a proposed Order.

1. Defendant has been charged in a multiple count drug conspiracy case.

2. The discovery in this case includes sensitive material that reveals the identities of people who have co-operated with the government in this investigation. The discovery also includes Grand Jury material. The government anticipates that pursuant to its obligations under Federal Rule of Criminal Procedure 16, *Brady*, and *Giglio*, it will be required to produce such material.

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3. This Motion is submitted for the purpose of ensuring that material produced in discovery that is designated by the government as "Protected Material," is not disseminated or distributed to anyone other than defense counsel, members of the defense team, and the Defendant under the restrictions set forth in the proposed Order submitted with this Motion. Under the terms of the proposed Order, Defendant will be provided with an electronic copy on a CD-ROM of all of the "Protected Material." Defendant will be permitted to review the "Protected Material" in a controlled environment at the Federal Detention Center (FDC), but is prohibited from printing out, copying or disseminating the discovery. Defense counsel would not provide Defendant with copies (in any form) of any "Protected Material," nor allow Defendant or any other person to make copies of any "Protected Material."

4. The parties respectfully request that the Court issue the proposed Protective Order.

DATED this 21st day of July, 2016.

Respectfully Submitted,

ANNETTE L. HAYES
United States Attorney

/s/Michael Dion
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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

/s/ Becky Hatch
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